

JUDGE HALL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK- - - - - X
UNITED STATES OF AMERICA :

- v. -

: INDICTMENTROBERTO CARLOS DE JESUS,
a/k/a "Wendy Antonio-Rivera,"
a/k/a "Primo,"
JUAN RAFAEL GONZALEZ,
a/k/a "Rafo,"
MANUEL GONZALEZ,
a/k/a "Yeye,"
a/k/a "JJ,"
JOSE CRUZ,
JOSE HOLGUIN,
LORENZO RIVERA,
YISEL HEREDIA,
JOSE TAVERAS-ROSARIO,
JUAN MANUEL ANTONIO,
DIONICIO VASQUEZ-HERNANDEZ,
JUAN SURIEL,
WILFREDO RIVERA,
a/k/a "Benjamin," and
BECKY REYES,
a/k/a "Belkys,"
a/k/a "Kiki,"

: 13 Cr. ()

: **13 CRIM 438**

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Defendants. :

- - - - - X

COUNT ONE

The Grand Jury charges:

1. From in or about April 2013 through on or about May 13, 2013, in the Southern District of New York and elsewhere, ROBERTO CARLOS DE JESUS, a/k/a "Wendy Antonio-Rivera," a/k/a "Primo," JUAN RAFAEL GONZALEZ, a/k/a "Rafo," MANUEL GONZALEZ, a/k/a "Yeye," a/k/a "JJ," JOSE CRUZ, JOSE HOLGUIN, LORENZO RIVERA, YISEL HEREDIA, JOSE TAVERAS-ROSARIO,

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: JUN 10 2013

JUDGE HALL

JUAN MANUEL ANTONIO, DIONICIO VASQUEZ-HERNANDEZ, JUAN SURIEL, WILFREDO RIVERA, a/k/a "Benjamin," and BECKY REYES, a/k/a "Belkys," a/k/a "Kiki," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that ROBERTO CARLOS DE JESUS, a/k/a "Wendy Antonio-Rivera," a/k/a "Primo," JUAN RAFAEL GONZALEZ, a/k/a "Rafo," MANUEL GONZALEZ, a/k/a "Yeye," a/k/a "JJ," JOSE CRUZ, JOSE HOLGUIN, LORENZO RIVERA, YISEL HEREDIA, JOSE TAVERAS-ROSARIO, JUAN MANUEL ANTONIO, DIONICIO VASQUEZ-HERNANDEZ, JUAN SURIEL, WILFREDO RIVERA, a/k/a "Benjamin," and BECKY REYES, a/k/a "Belkys," a/k/a "Kiki," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance involved in the offense was one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

4. As a result of committing the controlled substance offense charged in Count One of this Indictment, ROBERTO CARLOS DE JESUS, a/k/a "Wendy Antonio-Rivera," a/k/a "Primo," JUAN RAFAEL GONZALEZ, a/k/a "Rafo," MANUEL GONZALEZ, a/k/a "Yeye," a/k/a "JJ," JOSE CRUZ, JOSE HOLGUIN, LORENZO RIVERA, YISEL HEREDIA, JOSE TAVERAS-ROSARIO, JUAN MANUEL ANTONIO, DIONICIO VASQUEZ-HERNANDEZ, JUAN SURIEL, WILFREDO RIVERA, a/k/a "Benjamin," and BECKY REYES, a/k/a "Belkys," a/k/a "Kiki," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of the offense and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense charged in Count One of this Indictment.

Substitute Assets Provision

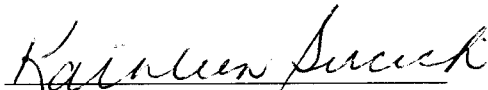
5. If any of the above-described forfeitable property, as a result of any act or omission of ROBERTO CARLOS DE JESUS, a/k/a "Wendy Antonio-Rivera," a/k/a "Primo," JUAN RAFAEL GONZALEZ, a/k/a "Rafo," MANUEL GONZALEZ, a/k/a "Yeye," a/k/a "JJ," JOSE CRUZ, JOSE HOLGUIN, LORENZO RIVERA, YISEL HEREDIA, JOSE TAVERAS-ROSARIO, JUAN MANUEL ANTONIO, DIONICIO VASQUEZ-HERNANDEZ, JUAN SURIEL, WILFREDO RIVERA, a/k/a


"Benjamin," and BECKY REYES, a/k/a "Belkys," a/k/a "Kiki," the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)


FOREPERSON


PREET BHARARA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

ROBERTO CARLOS DE JESUS, a/k/a "Wendy
Antonio-Rivera," a/k/a "Primo,"
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BECKY REYES, a/k/a "Belkys," a/k/a "Kiki,"

Defendants.

INDICTMENT

13 Cr. ()

(21 U.S.C. §§ 846, 853.)

PREET BHARARA

United States Attorney.

A TRUE BILL

Karen Smith

Foreperson.

6/10/13 Fld Indictment, ~~Fed~~ Case assigned to
Judge Failla.

Pitman, USMJ

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